

1 **RESHMA KAMATH**

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3 Menlo Park, California 94025, United States

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5 ***IN PROPRIA PERSONA***

6

7 **UNITED STATES DISTRICT COURT**

8 **NORTHERN DISTRICT OF CALIFORNIA**

9

10 **RESHMA KAMATH,**

11 **Plaintiff,**

12 **v.**

13 **SAN FRANCISCO POLICE**

14 **DEPARTMENT (SFPD); UNITED**

15 **STATES DEPARTMENT OF**

16 **HOMELAND SECURITY; FEDERAL**

17 **PROTECTIVE SERVICES; STEVE**

18 **GLUMAS; SECURITY GUARD # 1,**

19 **SECURITY GUARD # 2; AND DOES**

20 **1-10, INCLUSIVE,**

21

22 **Defendants.**

23

24 **Case Number: 3:23-CV-3531-JSC**

25

26 **VERIFIED FIRST-AMENDED**

27 **COMPLAINT FOR DAMAGES:**

28

29 **1. 42 U.S. Code § 1983 - Civil action**

30 **for deprivation of rights;**

31 **2. CONVERSION;**

32 **3. CIVIL ASSAULT.**

33

34 **DEMAND FOR JURY TRIAL**

FIRST-AMENDED COMPLAINT

INTRODUCTION

1. In addition to Defendant SFPD's utter failure to meet-and-confer prior to filing a FRCP 12(b)(6) motion in the prior round, Defendant SFPD and the Court in unison - have completely made a mockery of justice.

2. The country falls a little more into the rabbit-hole of nothingness when such prejudicial orders come out – with no facts to support its faulty reasoning.

3. Plaintiff objects to the substitution of City and County of SF in lieu of Defendant SFPD. Since the City/County are not proper parties, Plaintiff will continue to sue the Defendant SFPD in order to avoid duplication.

4. Further, Plaintiff states that the court in its prior order (as usual as White judges do) portrayed this as a “selective enforcement claim” and against a race/gender theory.

5. What the Court failed to do in its previous order is to understand and apply *Monell* liability appropriately – maybe because the Court doesn't understand how *Monell* works.

6. *Firstly*, the court order does a recitation of the law devoid of facts stated in the Complaint (pages 4-5 in ECF Dkt. No. 54) and thereafter in subsequent filings.

7. *Secondly*, the court order fails to check plausible facts in the Complaint, i.e. where the car was parked on 450 Golden Gate Ave., San Francisco, California.

1 94102, outside the federal Phillip Burton building. Plaintiff even produced pictures
 2 in the subsequent pleadings. A true and correct set of pictures is attached hereto and
 3 incorporated via reference herein in **EXHIBIT A and B**.
 4

5 8. Yet, the court order falsely states, “Plaintiff does not allege where the vehicle
 6 was parked or even that it was lawfully parked at the time of the incidents.” (pages
 7 5, lines 17-18, ECF Dkt. NO. 54). The complaint reiterates where the car was parked
 8 and pictures speak for themselves.
 9

10 9. Then, *thirdly*, the obviously-racist court-order in ECF Dkt. NO. 54 goes on to
 11 say more falsified allegations, i.e., “Plaintiff has sufficiently alleged that only her car
 12 was towed that day and there is no other explanation of why it was towed except in
 13 that no other vehicle was towed on that day.”
 14

15 10. Such of court’s circular statements in its prior order: that they are sufficient
 16 allegations, and in the next sentence, there is no other explanation, this is
 17 contradictory from the court to say the least.
 18

19 11. Moreover, when there was no other explanation in the prior complaint— that
 20 means there is **discriminatory intent and discriminatory effect**.
 21

22 12. When there is no race-neutral and gender-neutral explanation for ticketing and
 23 towing only of plaintiff’s car versus no other cars— which means Defendants acted in
 24 racist and gender-based discrimination.
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13. *Fourthly*, such facts are discovered during the discovery stage, not the
 1 plausibility of the complaint stage under FRCP 8(A).

14. This is just plain ol' White racism. White judges' self-fulfilling belief that
 4 they're infallible and above everyone – that they understand everyone and
 5 everything around them. But in reality, they're condescending, demeaning, and
 6 racist.

15. *Fifthly*, the court goes on to make more blatantly racist and borderline idiotic
 9 statements: "Likewise, although Plaintiff alleges she was targeted based on her race,
 10 ethnicity, and gender because she observed other vehicles similarly parked which
 11 were not ticketed, she does not allege the race, ethnicity, or gender of the
 12 owners/operators of those unticketed vehicles." (pg. 5, lines 22-25, ECF. Dkt. No.
 13 54). The reason this touches upon stupidity is that the owners/operators of the
 14 unticketed vehicles are not sitting there – they have parked their cars in front of the
 15 450 Golden Gate Ave., SF, CA building in an area with no signs of no parking, no
 16 reclamation sign on any sign, with a tree blocking any signage on a parallel street,
 17 and no red curb. The Defendants and the court in its failure ignore all that and turn a
 18 blind eye.

19. *Sixthly*, the Court goes on to make more assumptions and legally conclusory
 20 remarks stating somehow the court knows the only reason the ticket was issued was
 21 "illegally parked." Borderline racist and assumptive remarks from the White judicial

1 officer of the court. As usual, the court should remain confused and scratch its racist
2 head on why this is selective enforcement and discrimination. Rather, the court
3 should think from a rational and logical perspective – which the court has utterly
4 failed to do in its biased/prejudicial ruling.

6 17. If the court understands constitutional law (which clearly the court doesn't
7 based on its prior rulings), if one is treated differently than others similarly-situated,
8 that is sufficient to raise a 42 U.S.C. 1983 discrimination claim. It does not have to
9 be based on race and/or gender only.
10

11 18. Finally, this action seeks monetary damages because of the Defendants'
12 participation in the wrongful deprivation of a private person, particularly Plaintiff's
13 property; and, where Defendants had engaged in selective enforcement/
14 discrimination towards Plaintiff. The reason for solely seeking monetary damages is
15 injunctive relief would be moot. And, that is the only way to make Plaintiff whole
16 again.
17
18

|| VENUE & JURISDICTION

21 19. This Court has jurisdiction over Plaintiff's federal claim under 28 U.S.C. §§
22 1331 and 1343. The Court has supplemental jurisdiction over Plaintiff's claims,
23 which are based on state law, under 28 U.S.C. § 1337.

1 20. Venue in the United States District Court for the United States District Court
 2 Northern District of California San Francisco Division is proper pursuant to 28
 3 U.S.C. § 1391.
 4

5 21. Plaintiff alleges that all of the Defendants acted under color of state law and
 6 violated Plaintiff's rights under the Fourth and Fourteenth Amendments to the
 7 United States Constitution.
 8

9 22. Plaintiff also brings state law claims for second and third claims for relief
 10 pursuant to this Court's supplemental jurisdiction.
 11

PARTIES

13 23. Plaintiff is Reshma Kamath, a natural person residing in the United States,
 14 particularly in Arizona, and in California. For work purposes, Plaintiff is sometimes
 15 at 450 Golden Gate Ave., San Francisco, California, Phillip Burton building.
 16 ("subject-incident address.")
 17

18 24. Defendant is the San Francisco Police Department at or near subject-incident
 19 address.
 20

21 25. Defendant is the United States Department of Homeland Security at subject-
 22 incident address.
 23

24 26. Defendant is the Federal Protective Services housed in the United States DHS
 25 of the San Francisco federal court at subject-incident address.
 26

27 27. Defendant is Steve Glumas employed at subject-incident address.
 28

1 28. Defendant is police officer/security guard #1 John Doe, male, Filippino, short,
 2 bald and fat, at subject-incident address.

3 29. Defendant is police officer/security guard #2 John Doe, male, Nigerian, with
 4 tattoos, at subject-incident address.

5 **FACTUAL ALLEGATIONS**

6 30. In the year 2020, Plaintiff purchased a BMW 750 LI for personal and
 7 professional use. As a result of this transaction, Plaintiff became the owner of the
 8 vehicle.

9 31. The title, registration, and insurance of the vehicle were (and are) current at
 10 the time of Defendants' deprivation.

11 32. From May and July 2023, Defendants had engaged in selective enforcement,
 12 discrimination and harassment towards Plaintiff - particularly Defendants Glumas,
 13 security guards # 1 and # 2.

14 33. Between May and July 2023 on-going, Defendants SFPD and DHS FPS,
 15 particularly Defendants Glumas, security guards # 1 and # 2, have repeatedly given
 16 falsified tickets, to Plaintiff, atleast three (3) in total, and subsequently towed
 17 Plaintiff's vehicle. No other vehicle was ticketed at each of the times during the
 18 same time that Plaintiff's vehicle was parked at the subject address depicted in
 19 **Exhibits A and B. None of the windshields have a ticket displayed and no**
 20 **special permit stuck on the windshield.**

1 34. **This phenomenon continued even after the initiation of this complaint –**
 2 **all other vehicles freely parked in the subject-incident address with no tickets**
 3 **and no special permits. Definitely not towed.**

4
 5 35. During the stated-time, May-July 2023, several other cars and vehicles were
 6 parked on the same street at subject-incident address around Plaintiff's vehicle; and
 7 yet, not one of the other vehicles and cars had any tickets on them during each of the
 8 falsified ticket incidents by Defendants.

9
 10 36. Plaintiff took videos and photographs of the other vehicles and cars to show
 11 that none of the similarly-situated cars/vehicles parked in the same zone and same
 12 road across from, behind, and adjacent from Plaintiff's vehicle had any tickets on
 13 them during each of the falsified ticket incidents.

14
 15 37. It cannot be that this idiotic court thinks that the car was illegally parked, but
 16 then thinks all the other cars parked in the same place are legally parked. It is one or
 17 the other, cannot be both. None of them had special permits or certifications to park
 18 there.

19
 20 38. None of the other car drivers and passengers were Indians/Indian-Americans/
 21 and/or from Hindu culture.

22
 23 39. From naked eye observation, the other similarly-situated car parkers were
 24 White or Latin-Americans. Some had no one sitting in the car and the cars were
 25 parked for hours. There was no towing.

1 40. Between May and July 2023 on-going, Defendants SFPD and DHS FPS,
2 particularly Defendant Glumas, security guards # 1 and # 2 have repeatedly given
3 falsified tickets, to Plaintiff, atleast three (3) in total and towed Plaintiff's vehicle;
4 while SFPD and DHS FPS did not give any tickets to the cars around the Plaintiff's
5 vehicle. **See EXHIBIT A AND B with cars having no tickets and no special**
6 **permits displayed on the windshield or otherwise.**
7

8 41. Between May and July 2023 on-going, Defendants SFPD and DHS FPS have
9 repeatedly given falsified tickets, to Plaintiff, three (3) in total and towed Plaintiff's
10 vehicle; while Defendants SFPD and DHS FPS, each of them working in tandem,
11 have not towed any other cars and vehicles at the exact same place where Plaintiff's
12 vehicle was lawfully parked.
13

14 42. When Plaintiff saw the ticket in May 2023 from SFPD, it stated, "parking
15 restriction."
16

17 43. However, Plaintiffs have seen several cars parked at the exact same incident
18 address, same parking spot, with no tickets and no special permits, on numerous
19 other days.
20

21 44. On the same days, as seen in Exhibits A and B, even across the street, cars
22 were parked with no tickets and no special permits, on numerous other days.
23

1 45. Then, Plaintiff decided to park her vehicle in the same location the next time
2 Plaintiff is there to see whether Defendants will engage in repeated patterns of
3 selective enforcement and discrimination.
4

5 46. Defendants did just that. Defendants had intentionally engaged in repeated
6 patterns of selective enforcement and discrimination towards Plaintiff.
7

8 47. When Plaintiff saw the second and third tickets in June-July 2023 from SFPD,
9 it stated federal violation (July 10, 2023), and tow-away zone (July 11, 2023).
10 However, on the same days, Plaintiff has seen several cars in the same zone parked
11 right behind and in front of Plaintiff's vehicle with no ticket from Defendants. On
12 the same days, even across the street, any and all of the other cars parked in the same
13 zone had no tickets from Defendants.
14

15 48. Thus, it was clear that Defendants were engaging in selective enforcement
16 towards Plaintiff.
17

18 49. On July 11, 2023, the day of the second ticket, when Plaintiff was walking
19 from her work address to Plaintiff's vehicle, Plaintiff saw the Defendants' agents
20 watching her walk to her vehicle.
21

22 50. On July 12, 2023, the day of the second ticket, when Plaintiff was unlocked
23 her vehicle and started to drive, Plaintiff saw the Defendants' agent suddenly drove
24 up to and next to Plaintiff's vehicle.
25

1 51. The day of the tow-away on July 13, 2023, Plaintiff had decided to park her
2 vehicle in the same location (no red curb, no signage, tons of other cars parked on
3 that exact street) to see whether Defendants would engage in one more repeated
4 pattern of selective enforcement and discrimination.
5

6 52. Defendants did just that. Defendants intentionally engaged in repeated
7 patterns of selective enforcement and discrimination towards Plaintiff.
8

9 53. Defendants were scanning the license plate, and checking the name of the
10 person to whom the vehicle belongs to; and, when they saw Reshma Kamath having
11 ownership, the Defendants intentionally and invidiously only gave a ticket to
12 Reshma Kamath based on her race, ethnicity and gender.
13

14 54. Reshma Kamath is Indian-American, Asian, and is a woman of color.
15

16 55. From May and July 2023 on-going, Defendants SFPD and DHS FPS may
17 argue discretion; however, they have manifested their actions, and omissions, as
18 selective enforcement.
19

20 56. From May and July 2023 on-going, Defendants SFPD and DHS FPS may
21 argue discretion; however, they have manifested omissions, as selective
22 enforcement.
23

24 57. From May and July 2023 on-going, Defendants SFPD and DHS FPS may
25 argue discretion; however, they were acting under color of state and federal law.
26
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1 58. From May and July 2023 on-going, SFPD and DHS FPS, have scanned the
2 license plate of Plaintiff's vehicle, and saw that her name was Reshma Kamath; and
3 thereby, only given tickets to Plaintiff.
4

5 59. There is a video camera pointing to the street on 450 Golden Gate Ave., San
6 Francisco, California that Plaintiff intends to subpoena.
7

8 60. On July 12, 2023, agents of Defendants SFPD and DHS FPS started their car
9 at the same time that Plaintiff got into her car.
10

11 61. The agents, Defendants, security guards #1 and #2, were literally next to
12 Plaintiff's car when she was in her vehicle. They had waited for Plaintiff to approach
13 her vehicle, and then driven up next to her to observe who she was. When Plaintiff
14 made eye contact with them, they kept staring and almost blocked Plaintiff's
15 ingress/egress from the vehicle in the spot where Plaintiff was parked.
16

17 62. Clear racist misogyny from Defendants, security guards #1 and #2.
18

19 63. Plaintiff recognized the officer closest to Plaintiff's vehicle was an officer
20 who was bald.
21

22 64. The next day, the same officer appeared to not only tow Plaintiff's vehicle,
23 but also to **not** release her vehicle to her and slam the door while he was yelling at
24 Plaintiff. Plaintiff has the video.
25
26
27
28

1 65. On July 13, 2023, on-going, Defendants, SFPD and DHS FPS, i.e., security
2 guards #1 and #2, may argue discretion; however, they have manifested their
3 actions, and lack thereof, as selective enforcement.
4

5 66. Plaintiff even requested from Defendant Glumas whether there was a legal
6 unit there to discuss the issue.
7

8 67. Plaintiff has a video of Defendants, security guards #1 and #2, yelling, and
9 slamming the door on her outside SFPD and DHS FPS office at the subject incident
10 building, as well as, not allowing Plaintiff to sign the papers to release her vehicle
11 when Plaintiff had requested the release.
12

13 68. Plaintiff felt physically intimidated by the presence of Defendants' agents.
14

15 69. None of the Defendants afforded Plaintiff an opportunity to be heard prior to
16 the deprivation of the vehicle.
17

18 70. The seizure of Plaintiff's vehicle was unreasonable.
19

20 71. Defendants' agents stated to Plaintiff that the officer who has the alleged
21 "release form" for her vehicle was "gone for the day."
22

23 72. As a proximate result of Defendants' actions, Plaintiff was deprived of her
24 vehicle, has incurred expenses for alternate transportation, and has suffered extreme
25 embarrassment, shame, and mental distress.
26

27 73. To the date of her filing, Plaintiff does not have her property, Plaintiff's
28 vehicle with her.
29

1 74. Plaintiff had several errands to run after winning her jury trial on July 13,
 2 2023; and because of Defendants' conduct and omissions, Plaintiff was deprived on
 3 July 14, 2023, and thereafter, from performing those work-related errands.
 4

5 **CLAIMS FOR RELIEF**

6 **FIRST CLAIM OF RELIEF**

7 **42 U.S. Code § 1983 - Civil action for deprivation of rights**

8 75. Plaintiff hereby incorporates the preceding allegations as if fully rewritten
 9 herein.

10 76. Defendants at all times relevant to this action were acting under color of state
 11 and federal law.

12 77. Defendants unlawfully deprived Plaintiff of her property without due process
 13 of law in violation of the Fourteenth Amendment to the Constitution of the United
 14 States.

15 78. Defendants made an unreasonable and warrantless seizure of Plaintiff's
 16 vehicle at subject-incident address in violation of the Fourth Amendment to the
 17 United States Constitution.

18 79. Defendants were scanning the license plate, and checking the name of the
 19 person to whom the vehicle belongs to; and, when they saw Reshma Kamath having
 20 ownership, the Defendants intentionally and invidiously only gave a ticket to
 21

1 Reshma Kamath based on her race, ethnicity and gender, i.e., Reshma Kamath is
 2 Indian-American, Asian, and is a woman of color.

3 80. In addition to this, as a race-based and gender-based discrimination, (i) the
 4 other similarly-situated vehicles had individuals parked in the exact same subject-
 5 incident address; (ii) were not Indian/Asian; (iii) the other similarly-situated vehicles
 6 had individuals who were White or Latin-Americans; (iv) the other similarly-
 7 situated vehicles had individuals who were mostly male; and, (v) the other similarly-
 8 situated vehicles had individuals who were neither ticketed nor towed.

9 81. Further, same subject-incident address had (i) no red curb, (ii) no signage, and
 10 (iii) plenty of other similarly-situated vehicles parked in the exact same parking spot
 11 at the exact same subject-incident address of Plaintiff's car. See **EXHIBITS A, B.**

12 82. Moreover, there is a tree blocking a tow-away sign on the parallel street with
 13 yet another sign blocking that sign on the parallel street.

14 83. Parallel street would be perpendicular to the subject-incident address. Thus,
 15 neither the sign is visible, nor is there any marking where Plaintiff's car was parked.

16 84. Perpetrators-Defendants Glumas, security guard officers # 1 and 2 were all
 17 male. In fact, there is no woman who works as a security guard at the subject-
 18 incident ingress and egress on the Turk Street location when Plaintiff was there.

19 85. Defendants Glumas, security guard officers # 1 and 2 were non-white
 20 presumably, and not of them was Indian/Indian-American.

1 86. Defendants engaged in selective enforcement and discrimination.

2 87. When there is no other explanation— that means there is **discriminatory**
3 **intent and discriminatory effect.**

4 88. When there is no race-neutral and gender-neutral explanation for ticketing and
5 towing only of plaintiff's car versus no other cars— which means Defendants acted in
6 racist and gender-based discrimination.

7 89. Defendants must produce evidence that they ticketed and towed other
8 similarly-situated cars on the stated days – near Plaintiff's car, and/or at the same
9 location.

10 90. Defendants' agents were male and non-Indian based on Plaintiff's personal
11 knowledge.

12 91. Defendants also delayed returning Plaintiff's car to her making excuses that
13 the select personnel was not there.

14 92. Defendants, particularly security officers # 1 and 2, and Steve Glumas delayed
15 returning Plaintiff's car to her making excuses that the select personnel was not
16 there.

17 93. As a result, Plaintiff incurred costs.

18 94. At all times relevant hereto, Defendants acted pursuant to a policy and/or
19 custom of Defendants without court order and without providing an opportunity to

1 be heard under due process of the Fifth Amendment of the United States
2 Constitution.

3 95. Defendants violated the Fourth and Fourteenth Amendment of the United
4 States Constitution.

5 96. If leave to amend is further granted, Plaintiff would like to parse each of the
6 constitutional violations into a separate cause of action.

7
8 **SECOND CLAIM OF RELIEF**

9
10 **CONVERSION**

11 97. Plaintiff hereby incorporates the preceding allegations as if fully rewritten
12 herein.

13 98. The property was Plaintiff's vehicle.

14 99. Without Plaintiff's consent, from July 13, 2023 on-going, Defendants
15 negligently, and intentionally deprived Plaintiff of her rightful possession of
16 Plaintiff's vehicle.

17 100. Plaintiff went to the office of the DHS FPS, and was informed they will not
18 release her vehicle, because the officer with the release form were not there.

19 101. Plaintiff had ownership and/or right to possession of property.

20 102. Defendant's wrongful act toward and/or disposition of the property, such as
21 selective enforcement and discrimination to Plaintiff, interfering with plaintiff's
22 possession; and damage to plaintiff.

1 103. However, the two officers who were speaking to Plaintiff were from the prior
2 day in the car next to Plaintiff's vehicle; and, they walked up to Plaintiff knowing
3 they "knew" the Plaintiff.
4

5 104. At all times relevant hereto, Defendants acted with malice, recklessness and
6 total and deliberate disregard for the contractual and personal rights of Plaintiff.
7

THIRD CLAIM OF RELIEF

CIVIL ASSAULT

10 105. Plaintiff hereby incorporates the preceding allegations as if fully
11 rewritten herein.
12

13 106. Defendants security guards # 1 and 2 at the SFPD/DHS location
14 working for Defendants SFPD and DHS FPS created a reasonable apprehension of
15 physical and bodily harm to Plaintiff in the conduct of Defendants' agents on July
16 13, 2023 after 3 p.m. PT.
17

18 107. Defendants security guards # 1 and 2 at the SFPD/DHS location - were yelling
19 and screaming that was captured in a video.
20

21 108. Thus, Plaintiff had fear and apprehension of lack of her safety and her
22 bodily harm based on Defendants' conduct on July 13, 2023 after 3 p.m. PT.
23

24 109. Based on this, Defendants committed a civil assault upon Plaintiff.
25

26 ///
27

28 ///

PRAYER FOR RELIEF

- a. A judgment in favor of Plaintiff for \$10.50 million in damages inclusive of repairs to the damages to the car from tow-away and related;
- b. Actual, general, special and punitive damages in an amount to be determined at trial;
- c. A judgment for compensatory and expectancy damages in an amount to be determined at trial, plus reasonable attorneys' fees pursuant to 42 U.S.C. § 1988, against all Defendants;
- d. A judgment for compensatory and punitive damages in an amount to be determined at trial;
- e. A jury trial on all appropriate issues;
- f. An award of costs and expenses against the Defendants; and,
- g. Any and all other relief this Court may deem appropriate.

Sincerely,

DATED: APRIL 30, 2024

RESHMA KAMATH

Reshma Kamath

Plaintiff, *In Propria Persona*

VERIFICATION

I, RESHMA KAMATH, am plaintiff in the above-stated matter. I have read the

VERIFIED FIRST-AMENDED COMPLAINT FOR DAMAGES:

- 1. 42 U.S. Code § 1983 - Civil action for deprivation of rights;**
- 2. CONVERSION;**
- 3. CIVIL ASSAULT.**

and know the contents thereof. The matters stated therein are true of my own knowledge, except as to those matters that are therein stated on information and belief, and concerning those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

111

DATED: APRIL 30, 2024

RESHMA KAMATH

✓ Reshma Kamath

Plaintiff, *In Propria Persona*

PROOF OF SERVICE

F.R.C.P. 5 / C.C.P. § 1013(a)(3), C.C.P. § 1010.6(a)(6) / Cal. R. Ct. R. 2.260

I am employed in the County of San Mateo, California. I am over the age of 18, and not a party to this action. My mailing address is: 700 El Camino Real, Suite 120, #1084, Menlo Park, California 94025, and my e-mail address is reshmakamath2021@gmail.com for electronic-service. On May 01, 2024, I served the document(s) on: SEE ATTACHED SERVICE LIST.

VERIFIED FIRST-AMENDED COMPLAINT FOR DAMAGES:

- 1. 42 U.S. Code § 1983 - Civil action for deprivation of rights;**
- 2. CONVERSION;**
- 3. CIVIL ASSAULT**

PROOF OF SERVICE.

VIA ELECTRONIC SERVICE: In electronically transmitting courtesy copies of the document(s) listed above to the email address(es) of the person(s) set forth on the attached service list. To my knowledge, the transmission was reported as complete and without error, as per the electronic service agreement between all parties and their attorneys of record, herein.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct. Executed on May 01, 2024.

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FIRST-AMENDED COMPLAINT

 **RESHMA KAMATH**
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